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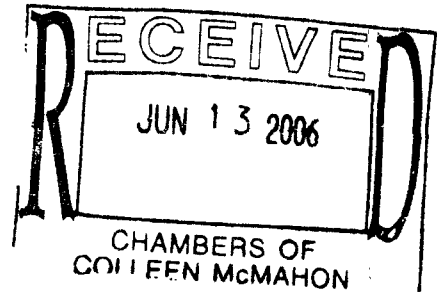
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June 13, 2006



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Honorable Colleen McMahon
United States District Court
300 Quarropas Street
White Plains, NY 10601

Client No.
P 88497-00016

6/13/06 DOBS Motion to dismiss denied

Re: *Shaw Family Archives, LTD., et al. v. CMG Worldwide, Inc., et al., 05-cv-3939*

Dear Judge McMahon:

We represent Marilyn Monroe, LLC in this consolidated action and respectfully submit this letter to address several outstanding issues relating to the scheduling order issued last week.

As Your Honor is aware, when Your Honor originally stayed the action filed by Plaintiffs/Consolidated Defendants (the "New York Action"), a motion to dismiss was pending (and had not been fully briefed). Although we believe that Your Honor intended to deny the Motion to Dismiss in its Memorandum Decision Regarding Choice of Law, dated May 19, 2006, the Decision does not expressly rule on the motion to dismiss (the decision addressed whether the Southern District of Indiana had jurisdiction over the defendants in that action, which party was the first to file, and which state's choice of law rules apply). Once the Court enters an order formally denying the motion to dismiss, Plaintiff/Counterclaim Defendants properly can answer the complaint filed in Indiana, and Defendants/Counterclaim Plaintiffs properly can answer the complaint filed in the New York Action, under Federal Rule of Civil Procedure 12(a)(4), which requires that responsive pleadings be filed within 10 days of notice of the Court's denial of a motion to dismiss. Additionally, we respectfully request that, to coordinate matters, the deadline for initial disclosures, which originally were scheduled to be exchanged on June 9, 2006, be extended to June 30, 2006. Counsel for all parties have agreed to these dates.

Copies mailed / handed / faxed to counsel 6/14/06

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We thank the Court for its kind consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Orin Snyder', is written over a horizontal line.

Orin Snyder

OS/mmc

cc: Brian Greben, Esq.

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